

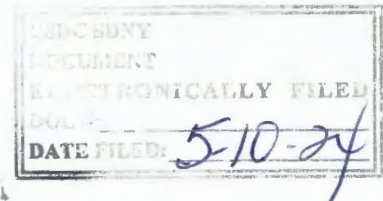
**Federal Defenders
OF NEW YORK, INC.**

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May 9, 2024



BY ECF

Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. Kahron Robinson**
23 Cr. 665 (LAK)

Dear Judge Kaplan,

Kahron Robinson, through undersigned counsel, respectfully requests a bail modification to permit him to leave his home on Saturday, May 11 and Sunday, May 12 for Mother's Day activities in the city with his partner and his family.

Mr. Robinson was released on September 29th, 2023, on a \$50,000 Personal Recognizance Bond, that was co-signed by two financially responsible persons, with travel restricted to the Southern and Eastern districts of New York and supervision under Pre-Trial Services. His conditions were modified on October 26, 2023, to include home detention enforced by location monitoring. Mr. Robinson has previously been given permission to spend the holidays at his maternal grandmother's home. He was completely compliant with the schedule set by the Court and enforced by Pretrial.

This weekend, Mr. Robinson's family has a series of events planned for Mother's Day, including dinner and bowling on Saturday, May 11 and Mother's Day brunch followed by dinner at his sister's home on May 12 (Mother's Day). Mr. Robinson requests permission to participate in these events outside of the home. He therefore requests the following schedule:

May 11: Leaving at 2:00 P.M. and returning home by 12:00 A.M.

May 12: Leaving at 2:00 PM and returning home by 12:00 A.M.

Mr. Robinson will provide notice of his itinerary to Pretrial in advance.

Pretrial takes no position on Mr. Robinson's request as long as court approval is granted. The Government defers to Pretrial.

Respectfully submitted,

/s/ Zawadi Baharanyi

Zawadi Baharanyi

Assistant Federal Defenders

Federal Defenders of New York

(212) 417-8735

cc: AUSA Emily Deininger

USPSO Dominique Jackson

Ordered

SO ORDERED:

Lewis A. Kaplan

HONORABLE LEWIS A. KAPLAN

United States District Judge

5/10/24